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 Telecom Management Group, Inc., d/b/a Unitel*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

STEVEN R. DAVIS,

Plaintiff,

v.

UNITEL VOICE, LLC d/b/a Telecom
 Management Group, Inc.; L3
 COMMUNICATIONS, LLC; SOMOS, INC. &
 DOES I-X; and ROE CORPORATIONS I-X,
 inclusive,

Defendants.

Case No.: 2:18-cv-00673-JCM-PAL

**JOINT STIPULATION FOR EXTENSION
 OF TIME TO ANSWER COMPLAINT
 AND [PROPOSED] ORDER**

(FIRST REQUEST)

**JOINT STIPULATION FOR EXTENSION OF TIME TO ANSWER COMPLAINT AND
 [PROPOSED] ORDER**
(FIRST REQUEST)

Plaintiff Steven R. Davis, *pro se* ("Davis," or the "Plaintiff"), and Telecom Management Group, Inc., an Illinois corporation doing business as Unitel ("TMGI," or the "Defendant"),¹ through its undersigned counsel of record, agree that upon the Court's approval, TMGI's response to Plaintiff's Complaint,² currently due on August 9, 2018,³ shall be due two weeks from that date, on August 23, 2018, for the reasons set forth below:

¹ TMGI reserves the right to address the name under which it appears in the caption in the future.
² ECF No. 4

1 1. Defendant's response to Plaintiff's Complaint presently is due on August 9,
2 2018.⁴

3 2. Defendant only just recently retained counsel to respond to this action, and
4 Defendant's counsel has requested additional time from Plaintiff to become familiar with the
5 matter before the Court prior to responding to Plaintiff's Complaint.

6 3. Following an e-mail exchange on August 8, 2018, Plaintiff agreed to allow
7 Defendant a two-week extension of time to respond to the Complaint.

8 4. Accordingly, Plaintiff and Defendant stipulate and agree that, upon the Court's
9 approval, Defendant's response to Plaintiff's Complaint shall be due on August 23, 2018.

10 5. The time for Defendant to answer or respond to Plaintiff's Complaint has not yet
11 elapsed, and this stipulation is supported by good cause as demonstrated in the foregoing
12 paragraphs.

13 6. Pursuant to Local Rule 6-1, this is Plaintiff and Defendant's first request for an
14 extension of this deadline; the parties seek this extension in good faith and not for the purposes
15 of delay. Further granting this brief two-week extension shall not prejudice any party to this
16 action.

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27 ³ See ECF No. 15 at 4

28 ⁴ *Id.*

1 Dated this 9th day of August, 2018, by the undersigned Plaintiff and counsel for
2 Defendant:

3
4 STEVEN R. DAVIS

DEVOY LAW P.C.

5
6 By: Steven R. Davis

By: /s/ J. Malcolm DeVoy
J. Malcolm DeVoy
Erica A. Bobak

7 Plaintiff, Pro Se

8 Attorneys for Defendant,
9 Telecom Management Group, Inc., an
10 Illinois corporation d/b/a Unitel

11
12 **[PROPOSED] ORDER**

13 It is hereby **ORDERED** that, good cause appearing, the parties' foregoing stipulation is
14 **GRANTED**, and Defendant's response to Plaintiff's Complaint shall be due on August 23, 2018.

15 Dated: August 10, 2018.

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19 J. A. Feen
U.S. Magistrate Judge